

WK:SMS  
F. #2022R00099

Filed  
3/28/2022

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK  
-----X

UNITED STATES OF AMERICA

- against -

ELIJAH BIEN AIME,

Defendant.

-----X

THE GRAND JURY CHARGES:

I N D I C T M E N T

1:22-cr-00133(PRK)(VMS)

Cr. No. \_\_\_\_\_  
(T. 18, U.S.C., §§ 924(d)(1),  
981(a)(1)(C), 1951(a) and 3551 et seq.;  
T. 21, U.S.C., § 853(p); T. 28, U.S.C.,  
§ 2461(c))

COUNT ONE  
(Hobbs Act Robbery)

1. On or about January 22, 2022, within the Eastern District of New York and elsewhere, the defendant ELIJAH BIEN AIME did knowingly and intentionally obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by robbery, to wit: the robbery of United States currency from a convenience store located on Glenwood Road in Brooklyn, New York.

(Title 18, United States Code, Sections 1951(a) and 3551 et seq.)

COUNT TWO  
(Hobbs Act Robbery)

2. On or about January 28, 2022, within the Eastern District of New York and elsewhere, the defendant ELIJAH BIEN AIME did knowingly and intentionally obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by

robbery, to wit: the robbery of United States currency from a convenience store located on Lenox Road in Brooklyn, New York.

(Title 18, United States Code, Sections 1951(a) and 3551 et seq.)

COUNT THREE  
(Hobbs Act Robbery)

3. On or about February 6, 2022, within the Eastern District of New York and elsewhere, the defendant ELIJAH BIEN AIME did knowingly and intentionally obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by robbery, to wit: the robbery of United States currency from a convenience store located on Glenwood Road in Brooklyn, New York.

(Title 18, United States Code, Sections 1951(a) and 3551 et seq.)

COUNT FOUR  
(Hobbs Act Robbery)

4. On or about February 6, 2022, within the Eastern District of New York and elsewhere, the defendant ELIJAH BIEN AIME did knowingly and intentionally attempt to obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by robbery, to wit: the attempted robbery of United States currency from a convenience store located on Pennsylvania Avenue in Brooklyn, New York.

(Title 18, United States Code, Sections 1951(a) and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION  
AS TO COUNTS ONE THROUGH FOUR

5. The United States hereby gives notice to the defendant that, upon his conviction of any of the offenses charged in Counts One through Four, the government will seek forfeiture in accordance with: (a) Title 18, United States Code, Section 981(a)(1)(C) and

Title 28, United States Code, Section 2461(c), which requires any person convicted of such offenses to forfeit any property, real or personal, constituting or derived from proceeds obtained directly or indirectly as a result of such offenses; and (b) Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, 2461(c), which require the forfeiture of any firearm or ammunition involved in or used in any violation of any other criminal law of the United States.

6. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Sections 924(d)(1) and 981(a)(1)(C); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

A TRUE BILL

  
FOREPERSON

BREON PEACE  
UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK

By:

  
Assistant U.S. Attorney

No.

**UNITED STATES DISTRICT COURT**

*EASTERN District of NEW YORK*

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

ELIJAH BIEN AIME,

Defendant.

**INDICTMENT**

(T. 18, U.S.C., §§ 924(d)(1), 981(a)(1)(C), 1951(a) and 3551 et seq.;  
T. 21, U.S.C., § 853(p); T. 28, U.S.C., § 2461(c))

*A true bill.*

*Deight Reid*  
Foreperson

Filed in open court this \_\_\_\_\_ day,

of \_\_\_\_\_ A.D. 20 \_\_\_\_\_

Clerk

Bail, \$ \_\_\_\_\_

*Sophia M. Suarez, Assistant U.S. Attorney (718) 254-7480*